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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

SUK JOON RYU, a/k/a James S. Ryu,

Plaintiff,

v.

BANK OF HOPE,

Defendant.

Civil Action No.: 2:19-18998 (KM) (JBC)

Document Electronically Filed

**CERTIFICATION OF
ERIC W. MORAN, ESQ.**

I, Eric W. Moran, Esquire, hereby certify as follows:

1. I am an attorney-at-law of the State of New Jersey and a Member of the Firm of Epstein Becker & Green, P.C., attorneys for Defendant Bank of Hope

(“Bank”) in this matter. I make this Certification in opposition to Plaintiff Suk Joon Ryu’s (“Ryu”) motion for sanctions under Rule 11.

2. Attached hereto as **Exhibit A** is a true and correct copy of the September 3, 2020 Email Conversation between counsel for Defendant and Counsel for Plaintiff, concluding in an email sent at 7:14 pm.

3. Attached hereto as **Exhibit B** is a true and correct copy of the September 3, 2020 Email Conversation between counsel for Defendant and Counsel for Plaintiff, concluding with an email sent at 7:15 pm.

4. Attached hereto as **Exhibit C** is a true and correct copy of the September 9, 2020 Rule 11 Notice from Plaintiff.

5. Attached hereto as **Exhibit D** is a true and correct copy of the September 25, 2020 Letter to Plaintiff Counsel.

6. Attached hereto as **Exhibit E** is a true and correct copy of the October 9, 2020 Letter to Plaintiff Counsel.

7. Attached hereto as **Exhibit F** is a true and correct copy of the October 21, 2020 Letter from Plaintiff Counsel.

8. Attached hereto as **Exhibit G** is a true and correct copy of the excerpted transcript of the July 13, 2017 Deposition of Lisa Pai, with highlighting.

9. Attached hereto as **Exhibit H** is a true and correct copy of the excerpted transcript of the August 18, 2017 Deposition of Lisa Pai, with highlighting.

10. Attached hereto as **Exhibit I** is a true and correct copy of the transcript, produced by Plaintiff as JR000517-24, of a February 13, 2014 conversation between Plaintiff and Karen Chon at a diner. The transcript was filed by Plaintiff's counsel as an exhibit to the October 2, 2020 Declaration of James Ryu (ECF No. 56).

11. Attached hereto as **Exhibit J** is a true and correct copy of the excerpted transcript of the June 14, 2018 Deposition of James Ryu, with highlighting.

12. Attached hereto as **Exhibit K** is a true and correct copy of "Ryu 43," a January 30, 2014 email enclosing a news article.

13. Attached hereto as **Exhibit L** is a true and correct copy of the excerpted transcript of the June 23, 2016 Deposition of Karen Chon, with highlighting.

I hereby certify that the foregoing statements made by me are true to the best of my knowledge. I am aware that if any of the statements made by me are knowingly false, I may be subject to punishment.

By: /s/ ERIC W. MORAN
Eric W. Moran, Esquire

Date: December 11, 2020